

POST-SECONDARY EDUCATION AND VOCATIONAL TRAINING SERVICES

I. LEGAL AUTHORITY

Rehabilitation Act of 1973, as amended in Title IV of the Workforce Investment Act of 1998; Rehabilitation Act of 1973, (P.L. 93-112) as amended by P.L. 93-516 and P.L. 95-602, Code of Federal Regulations, Title 34, Part 361.42(a)(4), (16); 29USC 722(a)(3).

II. POLICY STATEMENT AND PURPOSE

The Office of Rehabilitation Services (ORS) will ensure that access to training services is available to assist individuals with a disability in preparing for, securing, retaining or regaining employment that is consistent with the individual's strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice, and appropriate to the needs of the individual. The ORS counselor may assist the individual to exercise informed choice when selecting appropriate training that will lead to the employment goal. Career information, counseling, career guidance and resources will be made available to the individual. If comparable services and benefits exist under any other program and are available to the individual, the VR agency must use those comparable services or benefits to meet in whole or in part the cost of the vocational rehabilitation services.

No training or training services in institutions of higher education may be paid for with funds under this part unless maximum efforts have been made by the state unit and the individual to secure grant assistance in whole or in part from other sources to pay for training.

III. PROCEDURES

Training is one means to assist an individual to reach his/her employment goal. ORS will assist the individual to choose training that has reasonable cost, can be completed in a reasonable time, and is necessary to achieve the employment goal chosen by the eligible individual as specified in the Individualized Plan for Employment.

The decision to pursue training should be the result of a comprehensive assessment of the individual's unique strengths, priorities, resources, concerns, abilities, capabilities, career interest, informed choice, experiences, aptitudes, and capacities. Work experience, transferable skills, an evaluation of the labor market, licensure and examination requirements (ex. BCI), consideration of rehabilitation technology and accommodation needs, and the specific vocational preparation required for the job(s) being considered should also be reviewed to assist the individual in selecting a training program.

Counselors should review the curriculum and/or the training plan to ensure its relevance to the vocational goal and meet the needs of the individuals. Throughout training, the counselor will closely monitor progress by obtaining the appropriate reports at specified intervals as

scheduled on the IPE. Areas to be monitored may include progress toward goals, passing grades, and attendance. For the counselor to ensure that the training facility, site or service meets the needs of the individual, the counselor must have a description of the program, course of study, or training.

The majority of individuals will undertake full-time training. Part-time academic and vocational training may be undertaken for a maximum of one year and only if such part-time study will lead to full-time student status or job placement. Further part-time study will be allowed only if disability or family related circumstances warrant it. ORS may establish a preference for in-state services, provided that the preference does not effectively deny an individual a necessary service. If the individual chooses an out-of-state service at a higher cost than at the in-state service, if either service would meet the individual's rehabilitation needs, the designated State agency is not responsible for those costs in excess of the cost of the in-state service.

A. Short-term Vocational Training Services

Short-term Vocational Training is defined as training provided by business, trade and technical schools, adult education, by community colleges, or universities that do not lead to a degree, do not qualify for federal financial aid and is completed in one year or less. Programs are highly specific, and prepare the individual for specific careers leading to immediate employment. Adult Education programs offer short courses useful in updating skills or knowledge. Examples of short-term vocational training programs are a copier repair course, or specialized computer training for blind individuals.

1. Counselors are encouraged to discuss cost comparisons of short-term vocational training with individuals in order to make informed, cost-effective choices.
2. Short-term training grants are subject to Agency Economic Need Policy 115.8. Individuals who meet the Economic Need standards will qualify for a short-term training grant.
3. Short term vocational training grants will not exceed actual cost of the training program or an amount equal to the current state university tuition and fees; whichever is lower. Shared costs will be adjusted in keeping with percentages identified under policy 115.8.
4. Subject to economic need, up to eight hundred dollars (\$800) may be available for books, and supplies required by the training program.

B. Long-term vocational training (Training at community colleges, 4-year colleges or universities). Long-term vocational training is defined as training in excess of one year that leads to a degree or certificate.

It often is referred to as higher education and generally occurs after high school. It is provided by business, trade, technical schools, colleges and universities. All are characterized by standard offerings for a set of occupational categories.

In many instances training in technical school, community college, vocational programs or programs leading to the Bachelor's level will sufficiently prepare the individual to attain an employment outcome and/or enter employment in his/her career path. ORS will assist an individual to choose training that is consistent with the individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, and is expected in the IPE. Training beyond a Bachelor's level may be considered when:

1. The entry level of the chosen employment requires training beyond a Bachelor's Degree; and/or
 2. The person's disability requires her/him to make a change in the occupation for which s/he prepared in obtaining the Bachelor's Degree, and that change requires graduate level training.
- C. The ORS provides assistance to students who have documented financial need. Students seeking financial assistance from VR Agency must follow these steps.
1. The individual must make available copies of previous school grade reports, GATB, or other relevant vocational appraisal data indicative of academic potential for the case record;
 2. The individual must file a Free Application for Federal Student Aid (FAFSA) each year. To ensure eligibility for maximum financial aid, the FAFSA should be submitted by the March 1 deadline. The FAFSA annual award year begins on July 1 and ends June 30 of the next year. This form is available online at <http://www.studentaid.ed.gov/>. The FAFSA is used to apply for federal & state grants, work-study, and loans.
 - a. The FAFSA must be filed each year regardless of whether a program is Pell Grant certified or not. The application provides verification of income and the amount of the family contribution utilized in the determination of the Net Remaining Need.
 - b. The individual must ensure that the Financial Aid Office (FAO) receives a copy of the Student Aid Report (SAR) and must consult the FAO to determine sources and amount of financial aid available.
 - c. If special circumstances arise (e.g., a dramatic decrease in income from the previous year), the student must file an appeal with the Financial Aid Office (FAO) at the school the individual plans to

attend. The school will determine if any changes will be made.

- (i) The individual will provide a copy of the Student Aid Report (SAR) to the ORS for the case record.
 - d. If the SAR indicates that the individual may be in default of a federal student loan, the individual will be referred to the Office of Higher Education to make appropriate arrangements with that office. ORS is unable to provide financial aid when an individual is in default status. Prior to any disbursement of VR financial assistance, the counselor must have a letter from the Office of Higher Education indicating that maximum efforts to repay the student loan have been made, that a waiver has been granted or a deferment has been approved. (The Training Supervisor can sign off on the "Request for Deferment of Repayment-Stafford Student Loan Program and Supplemental Loans for Students").
 - e. The individual must complete and sign Part A of the ORS-28, which the counselor subsequently mails to the FAO in order to obtain the Net Remaining Need and financial aid figures. A revised ORS-28 is submitted whenever a change in circumstances occurs (i.e., change in income, change in course load, refusal of a loan or work-study); the counselor will complete the ORS-28 section regarding special needs. (Special needs might be tutors, assistive technology, accommodations or specific programs/courses to address disability related needs).
 - f. The Student Aid Report (SAR) and the completed ORS-28 must be completed and returned to the counselor by August 1 for the Fall semester, December 1 for the Spring semester, April 15 for the Summer session or 30 days prior to the start of any program which does not follow the traditional academic calendar. If a student cannot meet these deadlines because of extenuating circumstances, the Training Supervisor can waive these deadlines.
3. The counselor will forward the signed ORS 28 to the FAO for completion of Part B for the FAO.
4. The counselor will take the following steps:
- a. Upon receipt of the ORS-28, with Part B completed by the FAO, the counselor will determine the amount of Agency financial participation by using the following procedures and completing the Agency's Training Grant Worksheet (ORS-29).
 - (i) The amount of Agency participation can never exceed the Net Remaining Need cited by the FAO in Part B of the ORS-28.

The Agency may not meet one hundred percent of the Net Remaining Need for any student. Individuals are eligible for Agency financial participation based on an analysis of need, utilizing the direct school expenses and the financial aid package.

- (ii) Direct school expenses are defined as those basic expenses necessary for post secondary education, such as tuition, fees, room & board (on campus or off campus when on campus housing is not available or suitable), books, supplies, and transportation, as well as any out of pocket special costs for services related to the individual's disability. Direct school expenses must be verified or documented in order to be paid by the Agency. Room and board will not be considered for students living in their own or family dwelling. Validation of the direct school expenses being claimed by the individual must be submitted to the counselor and included by the counselor as part of the Worksheet for Training Grants. The Agency will only pay for documented direct school expenses of financially eligible individuals. (Note that there is an eight hundred dollars (\$800) maximum for the standard academic year (nine months) for books and supplies.) With regard to room and board, ORS will limit the amount allowed for room and board by using the institution's stated cost of on campus housing and board fees. If the institution does not provide room and board, ORS's participation will be based on the state's public university's average fee for room and board.
- (iii) VR Agency financial participation is further limited by a maximum VR Agency grant (the tuition and fees of the State University, rounded to the nearest \$100, plus eight hundred dollars (\$800) for books), which is applied to the Unmet Need as cited on the Agency's Training Grant Worksheet. The total of all awards cannot exceed the net remaining need. *
- (iv) Federal Financial Aid such as Pell Grants are considered comparable benefits. Merit awards and merit scholarships are not considered to be comparable benefits and consequently will not be included as part of the Financial Aid deducted on the training grant worksheet (Form ORS 29). Student loans are considered if accepted as part of a financial aid package. The VR Counselor can substitute VR financial assistance for loans or work study not to exceed unmet need or net remaining need. (VR Counselor may substitute VR award assistance in place of

- declined loans subject to unmet need. When a student declines a loan offer, evidence of this must be in case record.
- (v) When training is for a continuous period longer than the traditional nine-month academic year, a proportionate amount of the Standard Grant for nine months will be applied to the Unmet Need (formula: standard grant, divided by nine, times the length of the program in months). When training is for a continuous period shorter than the traditional nine-month academic year, the amount of the agency grant will be proportionally reduced based on the length of the program.
 - (vi) When training is part-time, summer, or between mid session training basis, all of the above steps are applicable to capture any Pell or institutional monies which may be available as comparable benefits.
- b. The counselor will complete Part C of the ORS-28 and send a copy to the FAO.
 - c. If either the school changes its amount of financial assistance or the Agency changes its grant to the client during the grant period, that party must inform the other by forwarding a revised ORS-28 as soon as possible.
 - d. The ORS-28 is not sent to institutions that are not eligible for Pell Grant funds. If programs do not meet the definition of short-term training the counselor will use the following revised method to obtain a Net Remaining Need:
 - (i) The counselor will estimate a school budget by adding the figures for tuition, fees, books and supplies, and transportation to the current monthly SSI payment (the benefit rate can be obtained by calling the local SSA office) multiplied by twelve (12) (to approximate the cost of living);
 - (ii) Subtract from that sum the family contribution figure as cited on the SAR; and
 - (iii) Subtract any other sources of funding. The resulting figure is a Net Remaining Need for non-Pell Grant eligible schools only.

D. Tutorial

Intense instruction is provided individually or in small groups format to those who are failing a course or require individual instruction to successfully master a subject or

**RHODE ISLAND DEPARTMENT OF HUMAN SERVICES
OFFICE OF REHABILITATION SERVICES
POLICY AND PROCEDURES MANUAL**

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work related task. Tutorial services may be provided by an individual who has acceptable credentials in the specific area/subject.

(This policy applies to all new students and to those receiving standard grant prior to effective date. For those who are receiving funding beyond standard grant because of income below the poverty level on effective date of policy, an extension of previous policy provisions is granted for a period not to exceed three (3) years, as long as individual/family income continues to be lower than the poverty level. Effective March 2008, this policy applies to all individuals participating in VR agency funded training.)

*The Training Grant Coordinator, with the concurrence of the Administrator or Administrator's designee, may grant a waiver to limitations under extenuating circumstances.

“Helping individuals with disabilities to choose, find and keep employment”

Year in School: _____

INSTRUCTIONS

1. **Training Period:** Note the training period to which this worksheet applies.
2. **Net Remaining Need:** Insert the Net Remaining Need figure from the ORS-28 (or from the counselor's calculations for those institutions which are not Pell grant eligible). VR financial support can never exceed this amount.
3. **Training Expenses:** Insert the actual costs of tuition, fees, room and board, books and supplies (up to the VR maximum unless the individual is an independent student whose income is below the poverty guidelines) and bus transportation. Add these figures for the total expenses.
4. **Financial Aid:** Insert the total financial aid amount from the ORS-28.
5. **Unmet Need:** Subtract the total financial aid (Item 4) from the total expenses (Item 3).
6. **Vocational Rehabilitation Award:**

Authorize the Unmet Need up to the Standard Agency Grant or up to the balance of the cost as calculated on the worksheet; whichever is lower.

The Net Remaining Need cannot be exceeded under any conditions.

POVERTY INCOME GUIDELINES*

Size of Family	Poverty Guidelines
1	\$9,310
2	12,490
3	15,670
4	18,850
5	22,030
6	25,210
7	28,390
8	31,570

For family units with more than 8 members, add \$3,180 for each additional member.

*U.S. Department of Health and Human Services, Poverty Income Guidelines, published February 13, 2004, Federal Register / Vol. 69, No. 30.